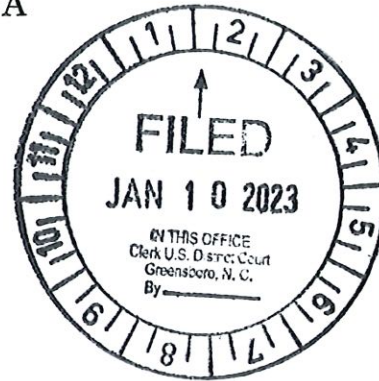


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



TAMMY MCCRAE-COLEY,

Plaintiff,

v.

STARTER HOMES PROGRAMS INC.,
et al.,

Defendants.

Case No. 1:21-cv-666
Plaintiff's Pretrial
Disclosures

PLAINTIFF'S WITNESS LIST

Joseph Delfgauw – CEO of Starter Homes et. al. companies.

Edward Winkler – Counselor for Joseph Delfgauw and In house Counselor for Joseph Delfgauw's companies.

EXHIBIT LIST

Pursuant to the court's Correspondence on December 6, 2022, TAMMY McCRAE-COLEY ("Plaintiff") hereby submit's her Exhibit List (accompanied by actual copies of each exhibits and a thumb drive with 3 videos).

- P – 1 June 28 2021 Email from Winkler - associate with fraud and dishonesty
- P – 2 IP address zip drive 10-17-22 from deposition
- P - 3 Melissa.com report pulled by Plaintiff Oct. 2022
- P – 4 Case No 3:31-cv-05610-JRC Barton v. Delfgauw
Motion for Terminating Sanctions
- P – 5 Case No 3:31-cv-05610-JRC Barton v. Delfgauw
Original Complaint for a Civil Case and Injunctive relief
- P – 6 Joseph Delfgauw – Denial to Relicense Real Estate
- P – 7 Defendants alleged opt-in without 02-24/2021 notation.
- P – 8 Copy of Unexplained 02-24-2021 document from Edward Winkler
- P – 9 Starter Homes Better Business Bureau info.
- P – 10 Notice of Deposition to Xanadu Marketing 30(b)(6)
- P – 11 Notice of Deposition to Xanadu Marketing
- P – 12 Delfgauw – Sentencing Memorandum United States v. D-1 Joseph Delfgauw Case 2:18-cr-20030-DML_DRG Filed 11/30/18
- P – 13 Delfgauw Judgment in a criminal case – United States v. Joseph Delfgauw Case number: 0645 2:218CR20030 (1)
- P – 14 Copies of the stock photos used on renttoownhomefinders.com website from crushpixel.com website as noted in the 2nd Amended Complaint.
- P – 15 Copy of Beenverified.com Terms of Service

- P – 16 May 21, 2021 email from Edward Winkler to Tammy McCrae-Coley
- P – 17 Deposition October 17, 2022 Xanadu Marketing 30(b)(6) – Joseph Delfgauw
- P – 18 Deposition October 17, 2022 Xanadu Marketing – Edward Winkler
- P – 19 Deposition October 21, 2022 Attorney Tyler Brooks Deposition of Tammy McCrae-Coley
- P – 20 Xanadu Internal DNC Policy
- P – 21 Copy of 2nd Amended Complaint Case No. 1:21-cv-666
- P – 22 Starter Homes Defendant's Combined Answers to Plaintiff's Interrogatories and Responses to Plaintiff's Requests for Production and Documents
- P – 23 Plaintiff's Answers to Starter Homes Interrogatories and Requests for Production of Documents.
- P – 24 Defendant zip drive Timeline letter
- P - 25 Screen video ApexpageBuilder.com (Thumb drive included)
- P – 26 Screen video renttoownhomefinders.com and other Defendants (Thumb drive included)
- P - 27 21 May, 2021 Mommiessavingsclub.com - Loom Recording.mp4 video (Thumb drive included)
- P 28 Joe Delfgauw Facebook Google video (Thumb drive)

This the __10th__ day of January 2023.

/s/ Tammy McCrae-Coley/

Tammy McCrae-Coley
TammyColeyjd@gmail.com
1400 Battleground Ave.
Suite 116 – L
Greensboro, NC 27408
336-491-3163

CERTIFICATE OF SERVICE

This is to certify that the undersigned Plaintiff has this day served the foregoing **Witness List and Exhibit List** on STARTER HOME PROGRAMS INC. et. al. in person, addressed to the following:

B. Tyler Brooks

100 E Lake Dr.

Greensboro, NC 27401

Cell: (336) 707-8855

btb@btylerbrookslawyer.com

This the __10th__ day of January 2023,

/s/ Tammy McCrae-Coley/

Tammy McCrae-Coley

TammyColeyjd@gmail.com

1400 Battleground Ave.

Suite 116 – L

Greensboro, NC 27408

336-491-3163